

UNITED STATES OF AMERICA
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Competitive Product Prices
Priority Mail Contracts 10 (MC2013-7)
Negotiated Service Agreement

Docket No. CP2013-7

PUBLIC REPRESENTATIVE COMMENTS ON
POSTAL SERVICE NOTICE OF AMENDMENT
TO PRIORITY MAIL CONTRACT 47
NEGOTIATED SERVICE AGREEMENT

(February 25, 2013)

The Public Representative hereby provides comments pursuant to Order No. 1660.¹ In that Order, the Commission established the above referenced docket to receive comments from interested persons, including the undersigned Public Representative, on a Postal Service Notice of a change in terms of Priority Mail Contract 47.² The change in the contract's terms is included in an amendment, a redacted version of which is provided in Attachment A to the Postal Service's Notice. The amendment changes the definition of the term "Contract Quarters" by setting a new starting and ending day for each quarter. Notice, Attachment A.

The Postal Service's request to add Priority Mail Contract 47 to the competitive product list was previously approved by the Commission in Order No. 1525.³ The Postal Service maintains that the supporting financial documentation and financial certification provided with its request remains applicable. Notice at 1. The Postal Service also asserts that the "amendment will not affect the cost coverage of Priority

¹ PRC Order No. 1660, Notice and Order Concerning Amendment to Priority Mail Contract 47 Negotiated Service Agreement, February 15, 2013.

² Notice of United States Postal Service of Amendment to Priority Mail Contract 47, with Portions Filed Under Seal, February 13, 2013 (Notice).

³ PRC Order No. 1525, Order Adding Priority Mail Contract 47 to the Competitive Product List, Docket Nos. MC2013-7/CP2013-7, November 2, 2012.

Mail Contract 47.” Id. The intended effective date of the amendment is the day that the Commission completes its review of the Notice. Id.

COMMENTS

The Public Representative has reviewed Priority Mail Contract 47, and the proposed amendment thereto. The amendment, in the form of a table to be inserted in “Section I.G.” of Priority Mail Contract 47, is noncontroversial.⁴ It specifies the starting and ending day for each quarter in a new fiscal year. Moreover, the amendment will have no effect on the cost coverage of Priority Mail Contract 47.

The Public Representative respectfully submits the foregoing comments for the Commission’s consideration.

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⁴ Pursuant to a discussion with Legal Counsel for the Postal Service, the Public Representative was informed that the reference in the amendment to “Section I.G.” is incorrect. Instead, the reference should be to “Section I.F.” of Priority Mail Contract 47.